

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION**

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MELVIN INGRAM;  
SHANTEL ADAMS;  
DAVID BECK;  
DWYANE BOWENS;  
ALFREDO CARDENAS;  
VERONICA CLEAVES;  
MARCUS COCHRAN;  
ROBERT COLUCCI;  
LESLIE CREWS;  
ERIC FLAKE;

JACOB GREENWELL;  
LAWONDA HODGES;  
LAROME HUMPHREY;  
ROBERT KATALTEPE;  
JOHN LINTNER;  
KEESHA MCCLINTON;  
LAKISHA MCCOY;  
CLIFTON MCCOY;  
DEDRECK MCVAY;  
HARRY OLIVER;

DARRELL ONSBY;  
FREDERICK RAYFORD;  
JOHN RILES;  
ASHLEY ROBERTSON;  
DEANDRE ROSSER;  
DUSTIN RUSSELL;  
PATRICK SHAW;  
CEDRIC TAYLOR  
JESSE TOWNSEND; and  
STEVEN WESBY;

|

Individually and as potential class

Representatives for all similarly

Situated claimants

**PLAINTIFFS**

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)

**VS.**

**NO: 17-cv-2795**

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BILL OLDHAM, in his individual capacity  
and in his official capacity as the Sheriff of  
Shelby County, Tennessee; ROBERT  
MOORE, in his individual capacity and in  
his official capacity as the Jail Director of  
the Shelby County, Tennessee; CHARLENE  
McGHEE, in her individual capacity and in  
her official capacity as the of Assistant Chief  
Jail Security of Shelby County, Tennessee;  
DEBRA HAMMONS, in her individual  
capacity and in her official capacity as the  
Assistant Chief of Jail Programs of Shelby  
County, Tennessee; SHELBY COUNTY,  
TENNESSEE, a Tennessee municipality;  
and TYLER TECHNOLOGIES, INC., a  
foreign corporation, and other unknown  
and unnamed Individuals and Entities,

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**DEFENDANTS**

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**JOINT STIPULATION IN RE: PLAINTIFFS UNNAMED  
IN CONSOLIDATED CLASS ACTION COMPLAINT**

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THE PARTIES JOINTLY STIPULATE AS FOLLOWS:

- 1) On March 9, 2018 (Doc. 89) this Honorable Court issued an order granting Defendants' Motion to Consolidate the instant action with *Powell et al. vs. Shelby County et al.* (16-cv-2907).
- 2) The Consolidated Complaint is likely to reduce the number of originally named Plaintiffs in the instant action from thirty (30) to three (3).
- 3) If class certification is granted in the consolidated case, the removal of these twenty-seven (27) individuals as named lead Plaintiffs in the consolidated complaint shall not prejudice any such individual's rights if any such individual is determined to be a member of any certified class.
- 4) If class certification is denied in the consolidated case, the removal of these twenty-seven (27) individuals as named lead Plaintiffs in the consolidated complaint shall not prejudice any such individual's rights to pursue an individual claim, to the extent permitted by applicable law.

**COUNSEL FOR PLAINTIFFS**

**Respectfully submitted,**

/s/ Daniel O. Lofton  
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*Attorneys, Plaintiffs/Class Representatives*

**Stipulated to**

**/s/Bradley Trammell**

Bradley Trammell

Atty. For Tyler Technologies

**Stipulated to,**

**/s/Odell Horton**

Odell Horton

Atty. For Shelby County

**CERTIFICATE OF SERVICE**

I, Daniel Lofton, do hereby certify that I have conveyed a true and correct copy of the foregoing to all counsel of record on this the 7th day of June, 2018.

Submitted,

**/s/ Daniel O. Lofton**  
DANIEL O. LOFTON